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May 19, 2005

National Organic Standards Board
C/O Arthur Neal
Room 4008 - South Building
1400 and Independence Avenue SW
Washington, DC 20250-0001

Dear Mr. Neal;

I have been an organic grower of hay and grain for dairies for 12 years. I am very concerned over proposed rules by the NOSB in section 205.239(a)(2) of the National Organic Program, published for public comment on March 22, 2005.

The restrictions of sections A & C would curtail the organic dairy business in Southern Idaho and even create the closure of some dairies. This is at a time when the demand for organic dairy products is increasing to the point of exceeding supply. The restrictions are contrary to the historical methods of dairying in our area.

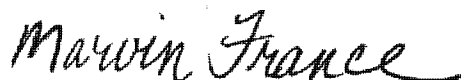
The requirement for "30% dry matter intake on a daily basis during the growing season and not less than 120 days" is very arbitrary and does not apply to every geographical area with climates and soil types that differ.

The reporting requirements in this section are unnecessary and are of no benefit when consideration is given to the record keeping that is already in place.

The NRCS grazing policy is set up for beef cattle grazing where animals are grazing on range for weeks or months at a time. The NRCS grazing policy does not apply to dairy cattle operations.

Your consideration of my comments is very appreciated.

Sincerely,



Marvin France
France Farms